

**EXHIBIT 7**

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
- - - - -  
ADRIAN SCHOOLCRAFT, Plaintiff,  
-against- Index No.  
10CIV-6005 (RWS)

THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO, Tax Id. 873220, Individually and in his Official Capacity, ASSISTANT CHIEF PATROL BOROUGH BROOKLYN NORTH GERALD NELSON, Tax Id. 912370, Individually and in his Official Capacity, DEPUTY INSPECTOR STEVEN MAURIELLO, Tax Id. 895117, Individually and in his Official Capacity, CAPTAIN THEODORE LAUTERBORN, Tax Id. 897840, Individually and in his Official Capacity, LIEUTENANT JOSEPH GOFF, Tax Id. 894025, Individually and in his Official Capacity, stg. Frederick Sawyer, Shield No. 2576, Individually and in his Official Capacity, SERGEANT KURT DUNCAN, Shield No. 2483, Individually and in his Official Capacity, LIEUTENANT TIMOTHY CAUGHEY, Tax Id. 885374, Individually and in his Official Capacity, SERGEANT SHANTEL JAMES, Shield No. 3004, and P.O.'s "JOHN DOE" 1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown) (collectively referred to as "NYPD defendants"), JAMAICA HOSPITAL MEDICAL CENTER, DR. ISAK ISAKOV, Individually and in his Official Capacity, DR. LILIAN ALDANA-BERNIER, Individually and in her Official Capacity and JAMAICA HOSPITAL MEDICAL CENTER EMPLOYEES "JOHN DOE" # 1-50, Individually

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2 and in their Official Capacity (the name  
3 John Doe being fictitious, as the true  
4 names are presently unknown),

5

Defendants.

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111 Broadway  
New York, New York  
February 11, 2014  
10:30 a.m.

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9

10 VIDEOTAPED DEPOSITION of DR. LILIAN  
11 ALDANA-BERNIER, one of the Defendants in  
12 the above-entitled action, held at the  
13 above time and place, taken before  
14 Margaret Scully-Ayers, a Shorthand  
15 Reporter and Notary Public of the State  
16 of New York, pursuant to the Federal  
17 Rules of Civil Procedure.

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1                   L. ALDANA-BERNIER

2   risk," can you quantify that for me at  
3   all what you mean by potential?

4                   A.   The patient comes in barricaded  
5   himself, acting bizarre. He was brought  
6   in from his house. It was a police  
7   officer who may have access to weapons,  
8   easy for him to have access to weapons.  
9   He is paranoid. I would think that maybe  
10   it would be safe if the patient will be  
11   admitted.

12                  Q.   So your thought he might be  
13   safe if he was admitted?

14                  A.   If he was admitted.

15                  Q.   That's what you were talking  
16   about when you say potential risk,  
17   correct?

18                  A.   All of the above that I told  
19   you.

20                  Q.   Can you quantify what you mean  
21   by potential risk as far as the  
22   likelihood of risk? This word  
23   "potential" that you have been using, can  
24   you quantify that for me?

25                  A.   When you say "quantify," what

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1                   L. ALDANA-BERNIER

2                   do you mean?

3                   Q.        Sure.

4                   Well, you used the word  
5                   "potential." I would like to know what  
6                   you mean by potential.

7                   A.        If you think of the navy yard  
8                   disaster, was he an officer or army man?  
9                   He was so quite, no one ever found out  
10                   what was going on with him. So what  
11                   happened then?

12                   Or if you look at all of those  
13                   -- the Range Rover. Who are all of these  
14                   people that caused that? They are all  
15                   police officers.

16                   So if I think then I have to  
17                   make sure that when I see a patient in  
18                   the ER, I have to think in the future  
19                   that there will be no disaster, there  
20                   will be no destruction, or no one will  
21                   get harmed when they were discharged from  
22                   the ER.

23                   Q.        I was asking about what you  
24                   meant by potential.

25                   A.        That's the potential.

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1                   L. ALDANA-BERNIER

2                   Q.     So if there is any potential at  
3     all, you want to make sure that the  
4     patient is safe, correct?

5                   A.     Correct.

6                   Q.     And if there is any potential  
7     at all, you want to make sure the  
8     community is safe, correct?

9                   A.     That's correct.

10                  Q.     And if there is any potential  
11    at all, you were going to admit Mr.  
12    Schoolcraft, correct?

13                  MR. LEE: Objection to form.

14                  A.     With all of those reasons, yes,  
15    I would have to admit him.

16                  Q.     When you admitted him to the  
17    emergency room, there were certain rules  
18    and regulations --

19                  MR. SUCKLE: Withdrawn.

20                  Q.     When he was admitted to the  
21    psych floor, there were certain rules and  
22    regulations in the psych ward, correct,  
23    about clothes they wear, what hours  
24    visitors can come, correct?

25                  A.     Yes.